

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

UNITED STATES OF AMERICA

v.

Michael David Carroll
Defendant

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Docket No. 3:13 CR00076-1

**DEFENDANT'S NOTICE OF INTENT TO REQUEST POSSIBLE
DEPARTURE FROM THE U.S. SENTENCING GUIDELINES**

COMES NOW, the Defendant, Michael David Carroll, by and through his counsel of record, pursuant to §6A1.4 of the U.S. Sentencing Guidelines, and provides Notice that the Defendant intends to ask the Court to depart from the Sentencing Guidelines with the hopes of receiving probation from the Court. The Defendant is a good candidate for probation as he has no criminal history, has been working diligently while this case has been pending, and would like to continue working so he may be able to pay any ordered restitution timely. If the Defendant is incarcerated, he will lose his current employment and will find it difficult to obtain employment upon release, both of which will severely hinder the Defendant's ability to pay court-ordered restitution in a timely manner.

Respectfully Submitted, this 12th day of March, 2014.

/s/ Peter A. Schulte
PETER A. SCHULTE
State Bar No. 24044677
Schulte & Apgar, PLLC
4131 N. Central Exwy Ste 680
Dallas, Texas 75204
Office: (214) 521-2200
Facsimile: (214) 276-1661
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 12th day of March, 2014, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record.

/s/ Peter A. Schulte
Attorney for Defendant